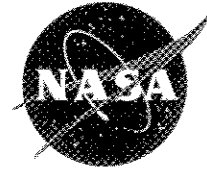


National Aeronautics and Space Administration  
**Headquarters**  
Washington, DC 20546-0001



October 23, 2009

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the Planetary Society Reception on November 9, 2009

On November 9, 2009, the Planetary Society, a non-profit under section 501(c)(3) of the Internal Revenue Code, will host a reception at the Senate Hart Office Bldg., SH902, in Washington, D.C., at 5:00 p.m. The reception is to announce the new Carl Sagan Fund for the future for innovation and creativity seeding space exploration and to present a Thomas O. Paine Award for advancement of human exploration of Mars.

Approximately 100 people have been invited and 25 are expected to attend. The estimated cost of the reception including all food and beverages is \$40.00 per person. The reception will be attended by NASA personnel, representatives of the aerospace industry, trade associations, the media, members of Congress and congressional staffers, academia, and employees of other Federal agencies. I find that this reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow attendees to the opportunity to discuss science and exploration related issues with other guests. Accordingly, NASA employees whose duties do not substantially affect the event sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in dark ink, appearing to read "Adam F. Greenstone", written over a horizontal line.

Adam F. Greenstone